

December 15, 1978

James Thomas, P.E., Chief
Southern Region
Office of Pipeline Safety Operations
1568 Willingham Drive, Suite 207B
Atlanta, Georgia 30337

RE: Hawkinsville, Georgia

Dear Jim:

The City of Hawkinsville has requested me to express my rationale for my gas system designs that excludes sectionalizing valves. There are few things we differ on. Unfortunately, this appears to be one of those things. I think what we agree on is the end result of a safely operated natural gas system. I have not been convinced that the use of sectionalizing valves in a small distribution system such as Hawkinsville adds to the safe operation of the system. In general and with specific reference to Hawkinsville, I would comment on this aspect as follows:

1. I have always considered this type of valve unnecessary. I see it as fulfilling no useful practical purpose. It works fine theoretically. But in the instances I am aware of where there were fires or explosions and there were sectionalizing valves no attempt was made to close these.
2. All valves are a source of leakage and I consider leakage the higher degree of hazard.
3. Almost all of the systems in the South designed and installed in the early fifties and sixties have had extensive paving programs with possibly second and third generation paving. Even where I have observed them, adequate sectionalizing valves with the best of maintenance have a habit of getting paved over and lost.
4. The larger number of valves would obviously require additional maintenance, which I believe can be better spent elsewhere.
5. I have designed approximately 123 natural gas systems in the South over the course of a 30 year career in the gas business. In this history of 3690 gas system/years I have not observed a single instance where sectionalizing valves

would have provided any additional safety or where there was any regret on my part as designer or any of the City's part as owner for the lack of same.

6. We come to a very practical matter. Namely, the difficulty, if not impossibility and certainly concomitant hazard of the retrofit installation of valves in Hawkinsville.

For the above reasons I would respectfully request your reconsideration of your numbered paragraph 2 in your letter of December 7, 1978. I would also point out that this matter is apt to come back and haunt us about 122 more times, without some sort of consideration at this time.

Respectfully,
Robert P. Grey, Consulting Engineer,
Inc.

Robert P. Grey, P.E.